

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

<b>THE COUNTY OF SUMMIT, OHIO,</b>  Plaintiff,  v.  <b>EXPRESS SCRIPTS, INC., EXPRESS SCRIPTS PHARMACY, INC., EXPRESS SCRIPTS HOLDING COMPANY, MEDCO HEALTH SOLUTIONS, INC., MERCK-MEDCO, UNITEDHEALTH GROUP, INC., OPTUM, INC., OPTUMRx, INC.</b>  Defendants.	<b>MDL NO. 2804</b>  <b>Case No.: 1:23-op-45001-DAP</b>  <b>Judge Dan Aaron Polster</b>  <b>MOTION FOR LEAVE TO FILE UNREDACTED COMPLAINT UNDER SEAL</b>
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Plaintiff, the County of Summit, Ohio (“the County”), through undersigned counsel, respectfully requests that this Court enter an Order permitting the County to file an unredacted version of the Complaint in the above-captioned matter under seal.

The County’s Complaint contains information from materials that are marked confidential. For this reason, the County electronically filed a redacted version of the Complaint and seeks to file an unredacted version of the Complaint under seal pursuant to Civil Local Rule 5.2. Civil Local Rule 5.2 provides that “[n]o document will be accepted for filing under seal unless a . . . prior court order authorizes the filing of sealed documents.” The County makes this motion to prevent unauthorized disclosure of information that has been designated as confidential.

In light of the “strong presumption in favor of openness” accorded to pleadings “which applies here with extra strength given the paramount importance of the litigation’s subject matter,” the County does not believe its Complaint should remain under seal. *In re Nat'l Prescription Opiate Litig.*, 927 F.3d 919, 939 (6<sup>th</sup> Cir. 2019). Accordingly, the County will contact the

designating party to attempt to resolve the assertions of confidentiality and publicly file an unredacted version of the Complaint.

WHEREFORE, the County moves the Court to enter the Proposed Order Granting Plaintiff's Motion for Leave to File Unredacted Complaint Under Seal, filed herewith.

Respectfully submitted,

Dated: January 4, 2023

*/s/ Linda Singer*  
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